

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KATHRYN HYLAND, MELISSA GARCIA,  
ELDON R. GAEDE, ELIZABETH TAYLOR,  
JESSICA SAINT-PAUL, REBECCA SPITLER-  
LAWSON, MICHELLE MEANS, ELIZABETH  
KAPLAN, JENNIFER GUTH, MEGAN  
NOCERINO, and ANTHONY CHURCH  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

NAVIENT CORPORATION and NAVIENT  
SOLUTIONS, LLC,

Defendants.

ECF Case

Case No. 18-CV-09031 (DLC)

**NOTICE OF DEFENDANTS' MOTION TO DISMISS  
AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, dated February 15, 2019, and the Amended Class Action Complaint in this action (ECF No. 32), Defendants Navient Corporation and Navient Solutions, LLC, by their attorneys Covington & Burling LLP, will move this Court, before the Honorable Denise L. Cote, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18B, New York, New York, as soon as counsel may be heard, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all causes of action in the Complaint, and for such other and further relief as the Court deems just and proper.

Dated: New York, NY  
February 15, 2019

Respectfully submitted,

COVINGTON & BURLING LLP

By: s/ Ashley Simonsen  
Ashley Simonsen

1999 Avenue of the Stars  
Los Angeles, CA 90067-4643  
asimonsen@cov.com  
Tel.: (424) 332-4800

Andrew A. Ruffino  
Alexander Setzepfandt  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
aruffino@cov.com  
asetzepfandt@cov.com  
Tel.: (212) 841-1000

*Counsel for Defendants*